



**MURIEL GOODE-TRUFANT**  
*Acting Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**Ilona J. Ehrlich**  
Assistant Corporation Counsel  
Labor & Employment Law Division  
(212) 356-2549  
iehrlich@law.nyc.gov

November 1, 2024

**BY ECF**

Honorable Nina R. Morrison  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Maureen Hurley v. The Department of Education of the City of New York  
Docket No. 24-CV-01664 (NRM) (LKE)

Dear Judge Morrison:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for defendant The Department of Education of the City of New York in the above-referenced action. Pursuant to Your Honor's Individual Practice Rule 5.2.3.1, I write to inform the Court that Defendant's motion to dismiss the Complaint pursuant to Rule 12(b) of the Federal Rules of Civil Procedure is fully briefed. The following moving papers have been electronically filed:

- Notice of Motion to Dismiss the Complaint
- Defendant's Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint
- Declaration of Kathleen M. Linnane in Support of Defendant's Motion to Dismiss the Complaint, along with Exhibit A
- Plaintiff's Opposition to Defendant's Motion to Dismiss
- Defendant's Reply Memorandum of Law in Further Support of its Motion to Dismiss and corresponding affidavit of service

As noted in the affidavits of service, Defendant's reply was timely served on Plaintiff on October 31, 2024. However, due to unanticipated technical difficulties yesterday, I was unable to file the fully briefed motion on ECF until today.

Respectfully submitted,

*/s/ Ilona J. Ehrlich*

Ilona J. Ehrlich

Assistant Corporation Counsel

cc: Maureen Hurley, (By Mail and Email)  
18 Kisco Park Drive  
Mount Kisco, NY 10549